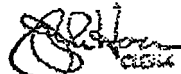


UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF SOUTH DAKOTA
CENTRAL DIVISION

FILED
MAY 19 2005


UNITED STATES OF AMERICA,

Plaintiff,

v.

DARREN YOUNGMAN,
a/k/a TOTE YOUNGMAN,

Defendant.

CR04-30110

SUPERSEDING INDICTMENT

18 U.S.C. §§ 1153, 1201(a)(2), 2241(a),
2246(2), 113(a)(3), 113(a)(6) and SDCL
22-32-1

KIDNAPPING, AGGRAVATED
SEXUAL ABUSE, ASSAULT WITH A
DANGEROUS WEAPON, ASSAULT
RESULTING IN SERIOUS BODILY
INJURY AND FIRST DEGREE
BURGLARY

The Grand Jury charges:

COUNT I

On or about between the 18th day of October, 2004, and the 20th day of October, 2004, in Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, did willfully and unlawfully seize, confine, inveigle, decoy, kidnap, and carry away Kathleen King, and hold her for the purposes of assaulting her and otherwise, in violation of 18 U.S.C. §§ 1153 and 1201(a)(2).

COUNT II

On or about between the 18th day of October, 2004, and the 20th day of October, 2004, in Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, did knowingly attempt to cause and cause

Kathleen King, to engage in a sexual act, that is, the penetration, however slight, of the genital opening of Kathleen King by an object, that is, a plastic tube, with the intent to abuse, humiliate, harass, and degrade Kathleen King, and arouse and gratify his sexual desire, by using force against her person, and by threatening and placing Kathleen King in fear that she would be subjected to death, serious bodily injury, and kidnaping, in violation of 18 U.S.C. § 1153, 2241(a) and 2246(2)(C).

COUNT III

On or about between the 18th day of October, 2004, and the 20th day of October, 2004, in Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, did knowingly attempt to cause and cause Kathleen King, to engage in a sexual act by using force against her person, and by threatening and placing her in fear that she would be subjected to death, serious bodily injury, and kidnaping, in violation of 18 U.S.C. § 1153, 2241(a) and 2246(2).

COUNT IV

On or about between the 18th day of October, 2004, and the 20th day of October, 2004, in Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, without just cause or excuse, did unlawfully assault Kathleen King with a dangerous weapon, that is, a belt, with intent to do bodily harm to Kathleen King, in violation of 18 U.S.C. §§ 1153 and 113(a)(3).

COUNT V

On or about between the 18th day of October, 2004, and the 20th day of October, 2004, in Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, without just cause or excuse, did unlawfully assault Kathleen King with a dangerous weapon, that is, shod feet, with intent to do bodily harm to Kathleen King, in violation of 18 U.S.C. §§ 1153 and 113(a)(3).

COUNT VI

On or about between the 18th day of October, 2004, and the 20th day of October, 2004, in Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, did unlawfully assault Kathleen King, and said assault resulted in serious bodily injury, in violation of 18 U.S.C. §§ 1153 and 113(a)(6).

COUNT VII

On or about between the 18th day of October, 2004 and the 20th day of October, 2004, at Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, did unlawfully enter and remain in an occupied structure, that is, the residence of Crystal LaPointe, with the intent to commit the crime of kidnaping and assault therein, and did inflict and did attempt and threaten to inflict physical harm on Kathleen King, in violation of 18 U.S.C. § 1153 and SDCL 22-32-1.

COUNT VIII

On or about between the 1st day of May, 2004, and the 30th day of September, 2004, in Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, without just cause or excuse, did unlawfully assault Sarah Reynolds with a dangerous weapon, that is, a belt, with intent to do bodily harm to Sarah Reynolds, in violation of 18 U.S.C. §§ 1153 and 113(a)(3).

COUNT IX

On or about between the 1st day of May, 2003, and the 30th day of September, 2003, in Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, did unlawfully assault Kimberly A. Jones, and said assault resulted in serious bodily injury, in violation of 18 U.S.C. §§ 1153 and 113(a)(6).

COUNT X

On or about between the 1st day of March, 2003 and the 30th day of September, 2003, in Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, did unlawfully assault Tricia O. Bordeaux, and said assault resulted in serious bodily injury, in violation of 18 U.S.C. §§ 1153 and 113(a)(6).

COUNT XI

On or about between the 1st day of March, 2003 and the 30th day of September, 2003, in Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, without just cause or excuse, did unlawfully assault Tricia O. Bordeaux, with a dangerous weapon, that is, shod feet, with intent to do bodily harm to Tricia O. Bordeaux, in violation of 18 U.S.C. §§ 1153 and 113(a)(3).

COUNT XII

On or about between the 1st day of March, 2003 and the 30th day of September, 2003, in Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, did unlawfully assault Tricia O. Bordeaux, and said assault resulted in serious bodily injury, in violation of 18 U.S.C. §§ 1153 and 113(a)(6).

COUNT XIII

On or about between the 1st day of March, 2003, and the 31st day of July, 2003, in Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, did knowingly attempt to cause and cause Tricia O. Bordeaux, to engage in a sexual act, that is, contact between the penis and the vulva, by using force against her person, and by threatening and placing her in fear that she would be subjected to death, serious bodily injury, and kidnaping, in violation of 18 U.S.C. §

1153, 2241(a) and 2246(2)(A).

COUNT XIV

On or about between the 1st day of March, 2003, and the 30th day of September, 2003, in Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, did knowingly attempt to cause and cause Tricia O. Bordeaux, to engage in a sexual act, that is, contact between the penis and the vagina, by using force against her person, and by threatening and placing her in fear that she would be subjected to death, serious bodily injury, and kidnaping, in violation of 18 U.S.C. § 1153, 2241(a) and 2246(2)(A).

COUNT XV

On or about between the 1st day of January, 2001, and the 31st day of May, 2003, in Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, without just cause or excuse, did unlawfully assault Brenna LaPointe with a dangerous weapon, that is, a belt, with intent to do bodily harm to Brenna LaPointe, in violation of 18 U.S.C. §§ 1153 and 113(a)(3).

COUNT XVI

On or about between the 1st day of January, 2001, and the 31st day of May, 2003, in Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, did knowingly attempt to cause and cause Brenna LaPointe to engage in a sexual act by using force against her person, and by threatening and placing her in fear that she would be subjected to death, serious bodily injury, and

kidnaping, in violation of 18 U.S.C. § 1153, 2241(a) and 2246(2).

COUNT XVII

On or about between the 1st day of January, 2003, and the 31st day of January, 2003, in Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, without just cause or excuse, did unlawfully assault Brenna LaPointe with a dangerous weapon, that is, a wooden flute, with intent to do bodily harm to Brenna LaPointe, in violation of 18 U.S.C. §§ 1153 and 113(a)(3).

COUNT XVIII

On or about between the 1st day of January, 2001 and the 31st day of January, 2003, in Todd County, in Indian Country, in the District of South Dakota, Darren Youngman, a/k/a Tote Youngman, an Indian, did unlawfully assault Brenna LaPointe, and said assault resulted in serious bodily injury, in violation of 18 U.S.C. §§ 1153 and 113(a)(6).

A TRUE BILL:


Foreman

MICHELLE G. TAPKEN
Acting United States Attorney

By 